



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

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February 5, 2007

Mr. Michael Bollinger
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**RE: Review Comments on Supplemental Groundwater Characterization Report
South Cavalcade Superfund Site
Houston, Texas**

The U.S. Environmental Protection Agency (EPA) has completed the review of the Supplemental Groundwater Characterization Report for the South Cavalcade Superfund Site (Prepared by Key Environmental, Inc. dated March 1, 2006). Below are EPA's comments. The TCEQ review comments dated November 15, 2006 are also enclosed.

EPA Comments

- Page 3-5 Section 3.3 - The document indicated that "No addition to, or movement of, DNAPL is anticipated over time, due to strong indications that the DNAPL has achieved a static distribution within the subsurface and the fact that 44 years have elapsed since wood treating was conducted at the site". Please provide data to support this.
- Page 3-7 Section 3.5 - Figure 3-7 shows that the rate of total DNAPL Recovery over time is decreasing - Not very clear how the recovery is decreasing. Please provide data to support this. Do we know the estimated total volume of DNAPL in the shallow zone and in the intermediate zone?
- Page 3-8 Section 3.5 - The discontinuation of this groundwater recovery component is expected to have a minimal effect on the dissolved plume migration. Please provide data to support this statement.
- Page 4-2 Section 4.4 - Wells MW-08, MW-09, MW-24, and MW-16 could not be located for various reasons. Have these been sampled before? Do these have GPS locations? What is the impact of not sampling these? What are the alternatives? Please discuss.
- Page 4-2 Section 4.4 - Well MW-12 contained a measurable thickness of DNAPL - what is the thickness?
- Page 5-1 Section 5.3 - This result is considered suspect because experience has shown that while the TOC of sandy material is typically low, it is almost always detectable. How do the current results compare to past sampling results?
- Page 5-2 Section 5.4 - Six of the seven permanent intermediate zone monitoring wells exceeded the naphthalene screening criterion and one exceeded the remedial goal for benzene. Please discuss the impact of these exceedances and what action will be taken.

Please contact me if you have questions or want to discuss these at 214-665-8529.

Raji Josiam
Remedial Project Manager, 6SF-RA

Enclosure: TCEQ Review Comments

c: Camille Hueni – EPA
Fay Duke – TCEQ
Jim Zubrow – Key Environmental

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